

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Russel S. Bleiler, III : Chapter 13

Debtor : No. 17-17743-jkf

**SHARON BLEILER'S RESPONSE IN OPPOSITION TO THE DEBTOR'S MOTION TO
CONVERT CASE TO CHAPTER 11**

Sharon Bleiler, by and through her attorney, responds to the Debtor's Motion to Convert

Case as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied as a conclusion of law.
5. Admitted.
6. Admitted.
7. Denied as a conclusion of law.
8. Denied.
9. Admitted.
10. Denied as a conclusion of law.
11. Denied as a conclusion of law.
12. Admitted.
13. Denied.

14. Denied as stated. It is admitted that Sharon Bleiler filed an unsecured proof of claim in the amount of \$714,544.00 representing unpaid equitable distribution obligation found by the Montgomery County Court of Common Pleas be owing to her and it is admitted that she

took possession of certain personal items of the debtor prior to the bankruptcy filing as authorized by the Montgomery County Court of Common Pleas as a result of the debtor's contemptuous refusal to comply with the parties' Property Settlement Agreement.

- 15. Denied.
- 16. Denied.
- 17. Admitted.
- 18. Admitted.

WHEREFORE, Sharon Bleiler respectfully requests this Honorable Court deny the Debtor's Motion and dismiss the Debtor's Chapter 13 case.

Respectfully submitted:

WATERMAN & MAYER, LLP.

Dated: January 3, 2017

By: /s/ Scott F. Waterman
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